

# Exhibit C

1 vehicles going that same speed?  
 2 A. I have no idea. The one I  
 3 was in was traveling about that rate. I  
 4 don't know what the other two were doing.  
 5 Q. Well, did the others get  
 6 there about the same time y'all did?  
 7 A. Yeah. Everybody got there  
 8 about the same time.  
 9 Q. Does that lead you to  
 10 believe that they probably more or less  
 11 were going about the same average speed?  
 12 A. Probably.  
 13 Q. Okay. Now, let's talk about  
 14 this job when the accident occurred.  
 15 What was the mission? Or  
 16 what was this particular job going to be?  
 17 A. Well, we were going up to --  
 18 I don't even remember the place now. I  
 19 just remember it was on the Jordan border.  
 20 We had a base up there, or  
 21 DYNACORP had a base up there. And they  
 22 were having problems with the base  
 23 station.

1 happened to it. I don't remember exactly  
 2 what.  
 3 Q. Was it two cars in front of  
 4 y'all and one in back?  
 5 A. After he sent the other one  
 6 back, yes. It started out with four cars  
 7 in front. I mean, two cars in front and  
 8 two cars in back and then our car.  
 9 Q. Okay. So then they had a  
 10 tail and --  
 11 A. Two leads and two tails  
 12 until something happened. I don't know  
 13 what happened with one of the cars. But  
 14 then we had two and one.  
 15 Q. All right. Was this the  
 16 first trip that you went on with Ronnie  
 17 Wood?  
 18 A. Yes.  
 19 Q. Had you known him since you  
 20 came in country?  
 21 A. He got there a little bit  
 22 after I did. I think I was there maybe  
 23 two weeks to a month before he got there.

1 So we were going up to  
 2 actually just redo the thing where we put  
 3 up another antennae. And we got it  
 4 working. It was already preprogrammed  
 5 before we got there. And our job was just  
 6 to install it or whatever you want to say  
 7 about that.  
 8 Q. Does Trebil ring a bell?  
 9 A. That sounds about right.  
 10 Q. On the Jordanian border?  
 11 A. That sounds about right.  
 12 Q. All right. How many  
 13 vehicles were in this particular trip?  
 14 A. Started off with about five,  
 15 I think. We had two of those cars in  
 16 front and two of them in back.  
 17 But it seems like on the way  
 18 there one had some type of problem, and he  
 19 sent it back to Baghdad. That's what it  
 20 seems like.  
 21 So eventually it was just  
 22 four cars I think after the other one  
 23 needed something done to it. Something

1 He came in after that.  
 2 Q. Was this a CODAN radio  
 3 station that y'all were putting in?  
 4 A. HF radio. That's right.  
 5 Q. Is that how you pronounce  
 6 it? CODAN?  
 7 A. CODAN, yes.  
 8 Q. And this is to allow this  
 9 outlying base to communicate with the  
 10 control centers?  
 11 A. Yeah. That CODAN, that HF  
 12 radio, would reach from where we were --  
 13 we were north of Fallujah, which we were  
 14 about four hours away from Baghdad, and it  
 15 could reach the Baghdad Hotel.  
 16 Actually, I made contact with  
 17 the Baghdad Hotel before we left. I had  
 18 to do that and make sure it was operating  
 19 properly before I left. And it was  
 20 operating.  
 21 Q. Are you aware of what  
 22 DYNACORP was using that radio for? What  
 23 kind of traffic they had?

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1 A. Just as far as I know basic  
2 security stuff. You know, if anything  
3 went on, they needed to raise somebody,  
4 that's what they used it for.

5 It's not like a regular  
6 police band radio, but, you know, for the  
7 region and for what it was for, you know,  
8 because you're so far out or they were so  
9 far out sometimes, they needed something  
10 to be able to reach the bases or wherever  
11 they were.

12 Say like, you know, if they  
13 were in Trebil, they need to reach  
14 somebody in Trebil. Or either they could  
15 even reach Baghdad if they needed to.

16 So they used them for  
17 day-to-day operations as far as I know.

18 Q. Could that radio, was it  
19 tuned with military frequencies as well as  
20 DYNCORP's frequency?

21 A. To my knowledge, it didn't  
22 have any military frequencies. I don't  
23 think he were even allowed to get on the

1 A. Yes.

2 Q. Was this security detail as  
3 far as the logistics and mechanics of it,  
4 was it essentially made up the way these  
5 security details or convoys had been for  
6 Tikrit and Mosul?

7 A. Pretty much. Except like  
8 when we went to Tikrit and Mosul, we used  
9 what they call the PSD, which were  
10 whoever -- like in some instances, like  
11 some South Africans had a PSD, which is  
12 personal security detail.

13 There were -- there were  
14 certain groups that took certain people.

15 Now, if you went anywhere,  
16 you always had to have some kind of  
17 security. But to go to Tikrit, we used  
18 the PSD teams. I don't know why, but we  
19 did.

20 Q. So you don't think this was  
21 a PSD team that --

22 A. The two guys that took me  
23 were part of a PSD team, but they took

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1 military channel. I don't think we had  
2 that.

3 I know we had all DYNCORP  
4 channels. We could talk to each base in  
5 and around Baghdad and Mosul and  
6 everywhere else. But I don't think we had  
7 military channels.

8 Q. Okay. Are you aware of how  
9 DYNCORP is set up as far as control  
10 centers that had military people in them  
11 or how they were set up?

12 A. Not really.

13 Q. Are you familiar with an  
14 acronym called the LMCC, the Logistics  
15 Movement Control Center?

16 A. Not really. That doesn't  
17 ring a bell.

18 Q. You essentially went where  
19 you were told and did what you were told  
20 to do and came back and didn't necessarily  
21 have the big picture as to what DYNCORP  
22 was -- what its operations were?

23 Is that fair to say?

1 local security also.

2 When I say local, I'm talking  
3 about those guys -- I can't think of what  
4 those guys' names are, but they had a  
5 name. Kurds maybe. I don't know. I  
6 don't want to say the wrong name.

7 But, anyway we always took  
8 these guys with us too. Well, these guys  
9 did. And in some cases, we used the PSD  
10 guys, and in some cases we used these  
11 other guys.

12 Q. But the Kurds or whatever,  
13 the local nationals, they appeared to be  
14 security people and they were armed  
15 themselves? Right?

16 A. Yes.

17 Q. And they had radios in their  
18 cars and whatnot?

19 A. They may have had a  
20 walkie-talkie talking back to the guy who  
21 took me. Because he was actually in  
22 control of them or whatever. He was like  
23 their superior.

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1 Q. All right. How many people  
 2 were in your vehicle?  
 3 A. It was the driver, the  
 4 passenger in the front. Ron Wood, myself  
 5 and an interpreter. So what? Five  
 6 people.  
 7 Q. Okay. Were there three of  
 8 y'all in the back seat?  
 9 A. Nope. The driver, the guy  
 10 in the passenger seat. Ron sat here. I  
 11 sat here. And the interpreter sat behind  
 12 us in like a jump seat or something. We  
 13 were in an Expedition.  
 14 Q. Was the interpreter, was he  
 15 facing backward? Or forward?  
 16 A. He was facing forward.  
 17 Q. Okay. You were behind the  
 18 passenger side seat?  
 19 A. Yes.  
 20 Q. You were on the right side  
 21 in the back seat?  
 22 A. Yes.  
 23 Q. Were these Americans who

1 It's like this is the cafeteria here. You  
 2 came into like a hallway. And there's a  
 3 little small store there. And then this  
 4 big room, and then a little bar was there.  
 5 So we were standing up -- not  
 6 standing but we were just sitting out in  
 7 this place and just hanging out.  
 8 And, you know, just -- you  
 9 know, how you meet. Where you from? I'm  
 10 from, you know, and stuff like that.  
 11 And he just happened to come  
 12 in. And somebody was telling me that he  
 13 was from Alabama. And then I started  
 14 talking to him from there.  
 15 Q. I got you. So that was  
 16 about the first week you were there.  
 17 Did you have any more  
 18 encounters with Mr. McCants?  
 19 A. I saw him on occasion, you  
 20 know, in and out after that -- after that  
 21 first day or first evening.  
 22 Q. Was he at any of the  
 23 security details that you had been out on

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1 were in the front seat?  
 2 A. Yes.  
 3 Q. Was it Mark Greenley and  
 4 James McCants?  
 5 A. Yes.  
 6 Q. Did you know them before  
 7 this particular trip?  
 8 A. I had met James before that.  
 9 I hadn't been there a week or so, and I  
 10 met James. He came in. He lived in  
 11 another hotel.  
 12 He may have lived in Al  
 13 Kaleidos. But he didn't actually stay in  
 14 the Baghdad Hotel with us.  
 15 Q. What kind of -- I mean, how  
 16 did you come to meet him?  
 17 A. In the Baghdad, you had this  
 18 room. I forgot what they called it. They  
 19 called it something. But it's a big open  
 20 room like a ballroom, but it's not a  
 21 ballroom.  
 22 But it's just a big open room  
 23 that came from where the cafeteria was.

1 before?  
 2 A. Nope. No.  
 3 Q. Before that day, did you  
 4 have any other professional work  
 5 encounters with him as opposed to kind of  
 6 sitting around shooting the breeze?  
 7 A. No.  
 8 Q. And you hadn't met  
 9 Mr. Greenley before?  
 10 A. I met -- I met Mark shortly  
 11 after that. He ended up -- he ended up  
 12 taking the Crucible class with us. And  
 13 he went out and shot with us that day too.  
 14 And then he had Bible study  
 15 one time and invited me to it. And I went  
 16 to that.  
 17 But I didn't, you know, he  
 18 was -- you know, he lived in that same  
 19 building as James did. So he didn't  
 20 actually stay in the Baghdad either.  
 21 Q. Other than the Crucible and  
 22 the Bible study, did you have any  
 23 professional encounters with Mark

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1 being too late to start back?  
 2 A. No, I didn't.  
 3 Q. So tell me what happened.  
 4 A. Like I said, I was back  
 5 there reflecting on myself.  
 6 And, you know, in this  
 7 particular convoy, I didn't really take  
 8 the -- we, you know, we weren't as ready  
 9 armed.  
 10 We were armed, but we weren't  
 11 standing ready as we were with the other  
 12 convoys for some reason.  
 13 But, anyway, on the way back,  
 14 like I say, we're coming back. We're  
 15 traveling a hundred and sixty kilometers.  
 16 And I'm looking out the  
 17 window this way. And I'm looking this  
 18 way, which is front. And then I'm looking  
 19 at the lead car, the two cars in front of  
 20 us.  
 21 I kind of noticed they kind  
 22 of slowed down. You know, these were  
 23 small cars. I mean, real small cars.

1 along the side of the road about where the  
 2 dog was?  
 3 A. Yeah. It was, you know,  
 4 it -- it almost seems like it was the same  
 5 spot where we put gas in.  
 6 And, you know, there were  
 7 cars. There were people out there. But  
 8 nobody was like on the -- on the right-of-  
 9 way of the road, you know. They were off  
 10 a little piece, you know, off into those  
 11 parking lots on the right side of that  
 12 highway.  
 13 Q. So you're saying that these  
 14 vehicles were not parked on the shoulder  
 15 itself?  
 16 A. No, sir.  
 17 Q. Did you see the dog?  
 18 A. Yes.  
 19 Q. What kind of -- I mean, how  
 20 big was it?  
 21 A. Average size. Probably  
 22 about -- I mean, he wasn't a big, big dog.  
 23 He wasn't a little dog. He was just

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1 Both of those cars slowed  
 2 down and just kind of veered to their left  
 3 and just kept going.  
 4 And when they -- I said I  
 5 wonder why they veered to myself. And  
 6 then I saw this dog come around, or come  
 7 across the highway.  
 8 And as that dog come across  
 9 the highway, to myself I said I hope he  
 10 doesn't try to miss this dog. And that's  
 11 what happened.  
 12 Like I said, we was traveling  
 13 a hundred and sixty kilometers, and he  
 14 tried to miss that dog.  
 15 He swerved to his left first.  
 16 And when he went to his left, you know, he  
 17 just kind of lost control. We went left  
 18 and came back right. That happened for a  
 19 few seconds. And then we headed toward  
 20 the median. And once he headed toward the  
 21 median, then that's where the accident  
 22 occurred.  
 23 Q. Did you see trucks parked

1 medium size. Brown, tan looking dog.  
 2 Just trotting across the highway.  
 3 Q. Did he come from where the  
 4 vehicles were parked?  
 5 A. I don't know where he came  
 6 from. But he came -- you know, we were  
 7 going back this way. He came kind of like  
 8 across this way in front of us  
 9 (indicating).  
 10 MS. EADY: She can't type  
 11 across this way. Was he coming --  
 12 A. From my left to right.  
 13 Q. And the cars were on the  
 14 right side?  
 15 A. The cars were on the right  
 16 side of the highway. But as we passed  
 17 those cars is where -- when the dog came  
 18 from my left, we were passing that little  
 19 store area where those vehicles were at.  
 20 And like I said, when he lost  
 21 control, you know, he never regained  
 22 control. Because that car was top heavy.  
 23 And it was full of equipment, full of



# Exhibit D



## FREEDOM COURT REPORTING

<p style="text-align: right;">Page 57</p> <p>1 was in the right -- right area, blocking,  2 you know, screening traffic, you know,  3 checking -- checking badges, different  4 people that were coming in and out of the  5 areas.  6 Q. Did your job, either for the  7 Atlanta Braves or in the military,  8 involve you driving people places?  9 A. Yes, ma'am.  10 Q. Okay. And when would that be?  11 A. Not with the Atlanta Braves.  12 Q. Okay. But with the military?  13 A. Yes, ma'am.  14 Q. And when would you drive people  15 places?  16 A. Whenever they needed to go to  17 different sites, depending on what job  18 task we were tasked to do.  19 Q. Did you get any driving  20 training?  21 A. Yes, ma'am.  22 Q. And what was that?  23 A. From the motor -- from the Motor</p>	<p style="text-align: right;">Page 59</p> <p>1 A. I don't understand the question.  2 Q. I mean, did they take you out --  3 you said they taught you about what I'd  4 call bigger vehicles, the buses, the  5 five-ton vehicles, carriers. Did they  6 ever work with you also on driving cars  7 that were the size of SUVs or passenger  8 cars or that kind of vehicle?  9 A. Yes, ma'am. They would have  10 been HUMVs at the time.  11 Q. All right. And what did they  12 teach you about HUMVs?  13 A. The same. Different driving  14 ratios, speeds, different obstacles that,  15 you know, you'd drive around and over  16 things like that nature.  17 Q. Did they do any training with  18 you on high speed driving?  19 A. No, ma'am.  20 Q. Any training on evasive  21 maneuvers?  22 A. Yes, ma'am.  23 Q. Okay. What did they tell you</p>
<p style="text-align: right;">Page 58</p> <p>1 Vehicle Division.  2 Q. Uh-huh.  3 A. Teach you how to drive buses,  4 five-ton vehicles, carriers.  5 Q. Carriers?  6 A. Yes, ma'am.  7 Q. What are carriers?  8 A. More buses. Anything with eight  9 or more passengers.  10 Q. What did they teach you about  11 driving with the buses and the vehicles  12 and the carriers?  13 A. Proper speeds, different turn  14 ratios. How to park.  15 Q. And when you say "proper  16 speeds," what did that mean?  17 A. Noticing the speed limits and  18 everything, obeying all traffic signs and  19 things like that when you're on post.  20 Q. Okay. Did you get any training  21 on driving passenger vehicles or SUV  22 vehicles with the Motor Vehicles  23 Division?</p>	<p style="text-align: right;">Page 60</p> <p>1 about evasive maneuver?  2 A. How to avoid, you know,  3 different obstacles that would be -- that  4 would be -- you would see in the road or  5 that would be placed on the side of the  6 road, things of that nature.  7 Q. And what did they tell you about  8 avoiding obstacles that you would see in  9 the road?  10 A. Depending on the speed ratio  11 whether or not, you know, it was  12 something that you could go over or  13 something that you could go through or to  14 that nature.  15 Q. All right. What is speed ratio?  16 A. Speed ratio is determining the  17 width and distance from the obstacle,  18 whether you speed up or slow down to that  19 nature.  20 MR. HOLMAN: Did you say width?  21 THE WITNESS: Width and  22 distance.  23 Q. (By Ms. Eady) Was there any</p>

15 (Pages 57 to 60)



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<p style="text-align: right;">Page 61</p> <p>1 discussion about how to handle situations 2 that involved rollovers? 3 A. Yes, ma'am. During the class 4 there was. 5 Q. Okay. And what did they tell 6 you about that? 7 A. I don't remember right off the 8 top of my head. It's been a long time. 9 Q. As a guess -- I'm sorry. Don't 10 guess. Give me your best judgment as to 11 the fastest speed that you ever drove at 12 performing a military duty. 13 A. Maybe 45 miles an hour. 14 Q. Okay. When you went in the 15 military the second time, what was your 16 job assignment? 17 A. Personnel management. 18 Q. Were your duties essentially the 19 same? 20 A. Yes, ma'am. 21 Q. Did you receive additional 22 training? 23 A. Yes, ma'am.</p>	<p style="text-align: right;">Page 63</p> <p>1 Aegis Management? 2 A. PSD. 3 Q. Personal security? 4 A. Yes, ma'am. 5 Q. And what did those duties 6 involve? 7 A. Providing security for the 8 client, moving them to different venues, 9 driving -- I mean, escorting from the 10 airport to Baghdad and different 11 locations throughout Iraq. 12 Q. And you were personal security 13 detail with Dyncorp also; correct? 14 A. Yes, ma'am. 15 Q. Were your duties essentially the 16 same as that with Aegis? 17 A. Yes, ma'am. 18 Q. You said that with Dyncorp you 19 were a liaison officer and a quality 20 control specialist? 21 A. Yes, ma'am. 22 Q. All right. What does a liaison 23 officer do?</p>
<p style="text-align: right;">Page 62</p> <p>1 Q. Was any of the training 2 different from what you -- about 3 different topics than what you were 4 trained on the first time? 5 A. No, ma'am. 6 MS. EADY: We've been going for 7 about an hour. Do you need to take a 8 break? 9 THE WITNESS: No, ma'am, I'm 10 fine. 11 MS. EADY: Okay. 12 Q. Are you registered to vote? 13 A. Yes, ma'am. 14 Q. In what state? 15 A. Georgia. 16 Q. And when did you register to 17 vote in Georgia? 18 A. 2002. 19 Q. Okay. Do you own any property 20 in Alabama, like real property is what we 21 call it, house, land, anything like that? 22 A. No, ma'am. 23 Q. What was your position with</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Monitor we -- had all four 2 border sites. Make sure that the quality 3 and everything is up to standard out at 4 the sites. 5 Q. Quality of what? 6 A. Living. 7 Q. Living? 8 A. Yes. 9 Q. All right. And what is a border 10 site? 11 A. We had a site out at Jordan, 12 Syria, Turkey, and Kuwait. 13 Q. Are they like encampments where 14 people lived? 15 A. Yes, ma'am. 16 Q. And who lived in these 17 encampments? 18 A. Our Iraqi employees. We also 19 had our American employees that lived out 20 there with them as well. 21 Q. So, who -- a liaison officer -- 22 who were you a liaison between? Or who 23 did you -- I think of a liaison officer</p>

16 (Pages 61 to 64)

## FREEDOM COURT REPORTING

<p style="text-align: right;">Page 69</p> <p>1 right between both vehicles, the vehicle 2 that's mobilized and actually the second 3 vehicle. So, you make a three-way 4 pattern. 5 Q. Uh-huh. 6 A. The driver of the third 7 vehicle -- I mean, the second vehicle 8 would get out, pull its tow bar up, lock 9 it onto the back of the vehicle. And 10 then both of them would drive out. 11 Q. Do you always have three 12 vehicles then when you go out somewhere? 13 A. It depends on the mission. 14 Q. Okay. How do they decide -- are 15 there -- did you receive training, or 16 were there guidelines about how you 17 decided how many vehicles go out and that 18 kind of thing on a mission? 19 A. Yes, ma'am. 20 Q. Okay. What kind of training did 21 you get? Was it a classroom, was there a 22 handbook? 23 A. No, ma'am. It was a classroom.</p>	<p style="text-align: right;">Page 71</p> <p>1 take a minimum of -- depending on the 2 severity, like I said, anywhere from six 3 to eight vehicles. 4 Q. Were there rules about how the 5 vehicles should move? 6 A. Yes, ma'am. 7 Q. Okay. And what were they 8 generally speaking, how fast they should 9 go, who went first, who went second, that 10 kind of stuff? 11 A. I don't understand the question. 12 Q. When they were teaching you 13 about the number of vehicles required for 14 a mission, did they also teach you the 15 manner in which those vehicles -- the 16 sequence with which those vehicles should 17 proceed? 18 A. Yes, ma'am. 19 Q. Did they teach you about the 20 speeds at which those vehicles should go? 21 A. Yes, ma'am. 22 Q. All right. What did they tell 23 you about that?</p>
<p style="text-align: right;">Page 70</p> <p>1 Q. Okay. And what did they tell 2 you about that? 3 A. I don't understand the question. 4 Q. What did they tell you about 5 determining the number of vehicles you 6 needed for a mission? 7 A. Depending on the size of the 8 mission, the destination of the mission, 9 that determined -- and the location of 10 the mission, that determined on how many 11 vehicles. 12 Q. So, what would require one 13 vehicle? 14 A. Never one vehicle. 15 Q. Never one. What's the smallest 16 number of vehicles you can have in a 17 mission? 18 A. Depending on -- depending on the 19 severity of the mission. If it was a 20 mission that was in town in Baghdad, 21 local, four SUVs. 22 Q. If it was out of town? 23 A. If it was out of town, you would</p>	<p style="text-align: right;">Page 72</p> <p>1 A. Depending on the situation, you 2 would have -- a normal -- a normal crew 3 would be six vehicles. That's on, you 4 know, a general move. You know, you do 5 six or more. The first vehicle is the 6 observation vehicle. 7 Q. Okay. 8 A. The second vehicle would be the 9 lead vehicle. 10 Q. Okay. 11 A. The third vehicle would be 12 considered the limo. 13 Q. That's the one carrying the 14 clients? 15 A. Yes, ma'am. 16 Q. The fourth and the fifth vehicle 17 would be observations vehicles. 18 (A short break was taken.) 19 Q. (By Ms. Eady) All right. 20 Mr. McCants, are you ready? 21 A. Yes, ma'am. 22 Q. We were going over, depending on 23 the situation, a normal crew was six</p>

18 (Pages 69 to 72)

**FREEDOM COURT REPORTING**

<p style="text-align: right;">Page 73</p> <p>1 vehicles. And you were telling me the 2 order they went it. And we had gone 3 through the first vehicle is the 4 observation vehicle, the second vehicle 5 is the lead vehicle, the third vehicle is 6 the limo, which is the vehicle carrying 7 the clients, the fourth and fifth 8 vehicles are observations vehicles. And 9 then what is the sixth vehicle? 10 A. The sixth vehicle would be the 11 gunship. 12 MR. HOLMAN: Gun what? 13 THE WITNESS: Gunship. 14 Q. (By Ms. Eady) And how are these 15 vehicles supposed to travel through the 16 country? Is there designated roads? Are 17 there designated speeds they have to go 18 at? Are there places they're supposed to 19 stop, places they're not supposed to 20 stop, areas they're supposed to avoid, 21 that kind of thing? 22 MR. HOLMAN: Nancy, I'm going to 23 object to the form of the question that</p>	<p style="text-align: right;">Page 75</p> <p>1 would come back, give us a report of 2 there's a group of vehicles that's been 3 parked in this location for two hours. 4 Q. Uh-huh. 5 A. It hasn't moved. 6 Q. Uh-huh. 7 A. People standing by. 8 Q. Uh-huh. 9 A. So, you still have to go through 10 that area. That tells you right there 11 whether you're going to try to avoid that 12 area or whether you're going to speed up 13 when you're going through that area, 14 different blocking techniques that you'll 15 use to go through that area. 16 Q. Okay. What are the different 17 threat levels? In the United States, 18 we've had the different colors -- 19 A. Yes, ma'am. 20 Q. -- for a while. Is it pegged to 21 that, or how do they designate threat 22 levels in Iraq or did they do it at the 23 time you were there?</p>
<p style="text-align: right;">Page 74</p> <p>1 you've asked a tremendous number of 2 questions all in one question. 3 Q. (By Ms. Eady) Right. I'm just 4 trying to get a feel for how these 5 vehicles are supposed to move. 6 MR. HOLMAN: It's hard to tell 7 what you're trying to find out -- 8 THE WITNESS: First question. 9 Q. (By Ms. Eady) When you've got 10 six vehicles going in a row from Baghdad 11 to one of the perimeter bases, first of 12 all, how fast are they supposed to go? 13 A. It depends on the threat level 14 of that day. 15 Q. All right. 16 A. You would know before you leave 17 base how, you know, the severity of the 18 situation that's going to happen that 19 day. You've already got your intel 20 reports. You've already had -- your 21 lookout vehicle went out and did 22 observation of the road or the travel -- 23 where you're going to be traveling. He</p>	<p style="text-align: right;">Page 76</p> <p>1 A. Yes, ma'am, they did. The 2 different threat levels were yellow would 3 have been caution. Green would have 4 been -- it's a fairly good road to 5 travel. Red would have been there's 6 danger your whole trip. Just be on high 7 alert the whole trip. 8 Q. All right. So, if it's a green 9 day, what speeds do you go at? 10 A. A green day, depending on -- I 11 mean, it could be -- 12 Q. Give me a range. 13 A. I don't really know how to 14 answer that question because just -- I 15 mean, it could be a green day, but as 16 soon as you get outside the gate, then in 17 less than five or ten minutes, it could 18 completely change. 19 Q. Say the route was green the 20 whole way, what speeds would you go at? 21 A. The route was green the whole 22 way, maybe -- on average maybe 65 to 70K 23 at the most.</p>

19 (Pages 73 to 76)

## FREEDOM COURT REPORTING

<p style="text-align: right;">Page 81</p> <p>1 A. Having cars blown up next to me  2 or not having cars blown up next to me?  3 Q. Not during a fire fight, not  4 having cars blown up.  5 A. Inside Baghdad?  6 Q. Outside Baghdad.  7 A. Outside Baghdad. Depending on  8 the area.  9 Q. Tell me the differences in the  10 areas and the speeds that you'd go at as  11 you went through them.  12 A. Ramadi and Fallujah were always  13 considered red areas. From the Baghdad  14 airport to Gate 12 was always considered  15 a red area.  16 Q. Okay.  17 A. Going to Babylon, Hilla, Kirkuk,  18 Irbil, Turkey.  19 Q. And what speeds did you go to  20 those at is what I'm trying to get at.  21 A. If everything was normal during  22 that -- during that period that you were  23 driving, 80 -- 70, 80K.</p>	<p style="text-align: right;">Page 83</p> <p>1 increase speed, depending on your  2 location and your surroundings up to 130  3 to 140K; was that correct?  4 A. Yes, ma'am.  5 Q. All right. And then you said if  6 things were -- things became heated,  7 you'd do whatever you could to get out of  8 there. What makes things become heated?  9 A. Car bombs, IEDs.  10 Q. Is this the suspicion that  11 they're there, or this there's actually  12 been one that goes off?  13 A. The intel that you're getting at  14 the time that you're moving through that  15 area.  16 Q. And do you get that intel on  17 like radio phones or something?  18 A. Yes, ma'am.  19 Q. How far apart are the vehicles  20 supposed to be as they travel? Or is  21 there a set distance the vehicles are  22 supposed to be apart from each other?  23 A. No, ma'am.</p>
<p style="text-align: right;">Page 82</p> <p>1 Q. All right.  2 A. If things got --  3 Q. Abnormal?  4 A. -- abnormal, you increased  5 speed, depending on, you know, the  6 location and your surroundings to 120,  7 130K.  8 If things became heated, you  9 would increase speeds to whatever it took  10 to get out of that situation.  11 Q. All right. And what kind of  12 situations make for a heated -- what kind  13 of circumstances make for a heated  14 situation?  15 A. Repeat the question, please.  16 Q. You said if things got heated --  17 well, first of all, you said, if things  18 were normal in a red area, you'd go on an  19 average 70 to 80K. Then you said if  20 things got abnormal, you would increase  21 speed, depending on the location and your  22 surroundings as needed. And you said if  23 things got heated -- well abnormal,</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. Can they be very strung out, or  2 are they supposed to be kind of close  3 together?  4 A. Depends on the severity of the  5 situation, the traffic, your  6 surroundings.  7 Q. The limo driver, is he supposed  8 to pay -- is he supposed to be aware of  9 his surroundings, or is he supposed to  10 just pay particular attention to  11 something?  12 A. Everybody is supposed to be  13 aware of their surroundings.  14 Q. Where do you get the -- is the  15 intelligence information that's provided  16 to you before you leave -- when you get  17 ready to leave on a mission, you said you  18 would get intelligence; correct?  19 A. Yes, ma'am.  20 Q. Was that provided to you in the  21 form of an oral or a written briefing?  22 A. Both.  23 Q. Both oral and written. And who</p>

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<p>1 vehicle. Told us, you know, to go to</p> <p>2 alert.</p> <p>3 So, when we approached the</p> <p>4 vehicles, the second -- upon approaching</p> <p>5 the truck stop, the second vehicle</p> <p>6 proceeded through. I shifted over to the</p> <p>7 center lane.</p> <p>8 When I passed the first three</p> <p>9 trucks, there was something -- a black</p> <p>10 object that came out into the road. I</p> <p>11 moved -- I pulled my steering wheel to</p> <p>12 the left. When I pulled my steering</p> <p>13 wheel to the left, my back wheels -- my</p> <p>14 left front wheel and my back wheel caught</p> <p>15 the gravel on the side of the road. I</p> <p>16 immediately pulled my wheel back over and</p> <p>17 tried to guide the truck back to the</p> <p>18 right center lane.</p> <p>19 On guiding my truck back to the</p> <p>20 right center lane, my back tires</p> <p>21 caught -- both tires caught the gravel,</p> <p>22 and it flipped into the center median</p> <p>23 into oncoming traffic and then down into</p>	<p>1 Q. Was this the security team in</p> <p>2 the second vehicle or the vehicle behind</p> <p>3 y'all, or is it everybody?</p> <p>4 A. The third -- it would have been</p> <p>5 everybody. The third vehicle. I'm</p> <p>6 sorry.</p> <p>7 Q. The fourth --</p> <p>8 A. The fourth and fifth vehicle.</p> <p>9 Yes, ma'am, the fourth and fifth vehicle</p> <p>10 had already set up the first security.</p> <p>11 The second vehicle had turned</p> <p>12 and came back. The first vehicle -- the</p> <p>13 second vehicle had radioed to the first</p> <p>14 to come back.</p> <p>15 So, at this time while they're</p> <p>16 continuing to set up the security all the</p> <p>17 way around, I initially -- me and -- I</p> <p>18 put my shoulder back in place. Me and</p> <p>19 Greenlee first pulled Emir out of the</p> <p>20 vehicle first.</p> <p>21 Q. Right.</p> <p>22 A. Got him over to the security</p> <p>23 vehicle, which was the Peugeot. Put him</p>
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<p>1 the embankment on the left-hand side of</p> <p>2 the road, landing on all four wheels.</p> <p>3 Q. What happened next?</p> <p>4 A. Immediately after that, once the</p> <p>5 car landed, I did my first observation</p> <p>6 check to find out if everyone was okay.</p> <p>7 Q. Right.</p> <p>8 A. At that point, I had just</p> <p>9 dislocated by left shoulder. My</p> <p>10 assistant driver and shooter had</p> <p>11 dislocated his right shoulder. Emir had</p> <p>12 a couple of scrapes and bruises. Robert</p> <p>13 had additional scrapes and bruises. He</p> <p>14 was confused. And Johnny said he was --</p> <p>15 he was hurting, but, you know, nothing</p> <p>16 you could observe at the time.</p> <p>17 Q. Uh-huh.</p> <p>18 A. I immediately got out -- got out</p> <p>19 of the vehicle. The security team -- at</p> <p>20 this time, the Iraqi inquiry security</p> <p>21 team had already set up a 380, which</p> <p>22 is -- I'm sorry. A 360, which is secure</p> <p>23 the whole circle full circle.</p>	<p>1 to the side.</p> <p>2 Q. It was a Peugeot?</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. Okay. What vehicle were y'all</p> <p>5 in that day?</p> <p>6 A. A black Expedition, Ford.</p> <p>7 Q. Okay. I'm sorry. Go ahead.</p> <p>8 A. At that time, Robert had got out</p> <p>9 of the truck, so we pulled him and put</p> <p>10 him over to the security vehicle as well.</p> <p>11 At this time, Johnny had</p> <p>12 stated -- he said his leg was -- he</p> <p>13 thought his leg was broken. And he</p> <p>14 was -- he was trapped in the vehicle.</p> <p>15 Q. Uh-huh.</p> <p>16 A. We broke the front seat, pulled</p> <p>17 him out because from where the seat was,</p> <p>18 it was already broken. So, we pushed it</p> <p>19 up and pulled him out of the back of the</p> <p>20 vehicle, me and Greenlee.</p> <p>21 Q. Okay.</p> <p>22 A. Placed him over with the</p> <p>23 security vehicle as well. At this time,</p>

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